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May 28, 2022

Honorable Andrew T. Baxter
U.S. Magistrate Judge
P.O. Box 7396
Syracuse, NY 13261-7396

Re: Puleo v. Masonic Medical Research Institute, et al.
Civil Act. No.: 6:20-cv-1593 (TJM/ATB)

Dear Judge Baxter:

Please receive this letter request for an approximate thirty (30) day extension for the close of the discovery and dispositive motion deadlines for the above captioned matter. Accordingly, the deadlines would be reset to July 1, 2022 for the close of discovery, and September 2, 2022 for the dispositive motion deadline.

Kindly recall that Plaintiff is trying to depose Lewis Guinther and Sarah Guinther, who are no longer under MMRI's employ and have not been deposed. Additionally, upon information and belief, they have moved out of state. Accordingly, Plaintiff is continuing to try and locate them for a deposition.

I thank the Court for its understanding and patience with this matter.

Respectively,

/s/ Zachary C. Oren

Zachary C. Oren, Esq.

CC: Adam P. Mastroleo, Esq. (*via cm/ecf filing*)
Hannah K. Redmond, Esq. (*via cm/ecf filing*)